

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI**

ANNE C. HART,)	
)	
Plaintiff,)	Case No. 4:18-CV-01548-JCH
)	
vs.)	
)	
ASCENSION HEALTH ALLIANCE,)	
)	
Defendant.)	

**UNOPPOSED MOTION FOR EXTENSION OF TIME
TO ANSWER OR FILE OTHER APPROPRIATE MOTION IN RESPONSE
TO FIRST AMENDED COMPLAINT**

COMES NOW Ascension Health Alliance, d/b/a Ascension (“Ascension”), by and through the undersigned counsel, requests seven (7) additional days, up to and including October 22, 2018, in which to answer or file an appropriate motion in response to Plaintiff’s First Amended Complaint.

1. On October 1, 2018, Plaintiff filed an Amendment Complaint.
2. Under Federal Rule of Civil Procedure 15(a), Defendant has 14 days to respond to an amended pleading, making the deadline for a responsive pleading or other appropriate motion October 15, 2018.
3. Due to the press of other litigation deadlines, Ascension requests an additional seven (7) days, up to and including October 22, 2018, to file an answer or other appropriate motion in response to Plaintiff’s First Amended Complaint.
4. Ascension’s counsel has consulted with counsel for Plaintiff. Plaintiff does not oppose this Motion.
5. This Motion is made in good faith and not for the purpose of hindrance or undue delay.

WHEREFORE, for the reasons stated herein, Ascension respectfully requests this Court to enter an order granting its request for an extension of time to answer or file an appropriate motion in response to Plaintiff's First Amended Complaint, and for such further relief this Court deems just and proper.

Dated: October 15, 2018

Respectfully submitted,

GREENSFELDER, HEMKER & GALE, P.C.

By: /s/ Amy L. Blaisdell
Amy L. Blaisdell, MO Bar #51068
Heather M. Mehta, MO Bar #64026
10 S. Broadway, Suite 2000
St. Louis, MO 63102-1747
Telephone: 314/241-9090
Facsimile: 314/241-3643
apb@greensfelder.com

*Attorneys for Ascension Health Alliance
d/b/a Ascension*

CERTIFICATE OF SERVICE

I hereby certify that on October 15, 2018, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

HAWKS QUINDELL, S.C.
Timothy P. Manyard
222 East Erie Street
Suite 210
P.O. Box 442
Milwaukee, WI 53201-0442
Telephone: 414-271-8650
Fax: 414-271-8442
Email: tmanyard@hq-law.com

William E. Parsons
409 E. Main Street
P.O. Box 2155
Madison, WI 52703-2155
Telephone: 608-257-0040
Fax: 608-256-0236
Email: wparsons@hq-law.com

Attorneys for Plaintiff

/s/ Amy L. Blaisdell